



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

STERN, LAVINTHAL & FRANKENBERG, LLC

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Attorney for Secured Creditor,  
Seterus, Inc., as authorized sub-servicer for Federal

National Mortgage Association

By: Jeanette F. Frankenberg, Esq.

Ashley L. Rose, Esq.

In Re:

Celia R Frederick

Debtor(s).

Order Filed on November 20, 2017  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No.: 15-27858-MBK

Chapter: 13

Hearing Date: November 7, 2017

Judge: Michael B. Kaplan

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY**

The consent order set forth on the following pages, numbered two (2) through three (3),  
is hereby **ORDERED**.

**DATED: November 20, 2017**

Honorable Michael B. Kaplan  
United States Bankruptcy Judge

Debtor: Celia R Frederick

Case No: 15-27858-MBK

Caption: Consent Order Resolving Motion to Vacate Stay

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Applicant:	<u>Seterus, Inc.</u>
Applicant's Counsel:	<u>Stern Lavinthal &amp; Frankenberg, LLC</u>
Debtor's Counsel:	<u>Daniel E. Straffi, Esq.</u>
Property Involved ("Collateral"):	<u>22 Westbrook Drive, Toms River, NJ 08757</u>

Relief sought:

- Motion for relief from the automatic stay
- Motion to dismiss
- Motion for prospective relief to prevent imposition of automatic stay

against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 6 months, from May 1, 2017 to October 1, 2017.
- The Debtor is overdue for 6 payments at \$696.13 per month.
- Less Funds held in debtor(s) suspense \$678.64

Total Arrearages Due \$3,498.14.

2. Debtor must cure all post-petition arrearages, as follows:

- Beginning on November 1, 2017, regular monthly mortgage payments shall continue to be made in the amount \$696.13.
- Beginning on December 1, 2017, additional monthly cure payments shall be made in the amount of \$583.02 per month for 6 months.

3. Payments to the Secured Creditor shall be made to the following address(es):

Regular monthly payment: Seterus, Inc.  
P.O. Box 11790  
Newark, NJ 07101-4790

Monthly cure payment: Seterus, Inc.  
P.O. Box 11790  
Newark, NJ 07101-4790

In the event of Default:

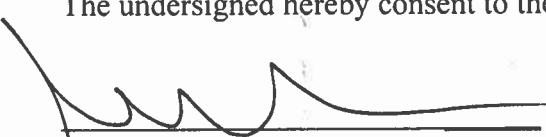
If the Debtors fail to make the immediate payment specified above or fail to make any regular monthly payment or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtors' failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney.

4. Award of Attorneys' Fees:

- ✓ The Applicant is awarded attorneys fees of \$350.00, and costs of \$181.00.

The fees and costs are payable through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order



Daniel E. Straffi, Esq.  
Attorney for the Debtors

/s/ Jeanette F. Frankenberg

/s/ Ashley L. Rose

Jeanette F. Frankenberg, Esq.  
Ashley L. Rose, Esq.  
Attorney for Secured Creditor